

23713 W. PAUL ROAD, SUITE D PEWAUKEE, WI 53072 (P) 262.523.9000 (F) 262.523.9001

2011 Annual Progress Report and Master Schedule Update

Remedial Investigation/Feasibility Study Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

CERCLA V-W-08-C-917

Revision 0 Project No.: 1982 October 28, 2011

US EPA RECORDS CENTER REGION 5

512764

TABLE OF CONTENTS

1	INTR	ODUCTION	***************************************	1
	11	Scope		1
	12	Overview.		1
2	MULT	ri-site doguments		2
	2 1	Multi-Site RI Documents .		2
	22	Multi-Site FS Support Document		3
	23	Multi-Site Document Status		3
	2 4	Multi-Site Meetings . ,	 -	3
3	SITE	PROGRESS		5
	3 1	Overview Progress Meetings .		6
	3 2	South Station Upland OU (South Branch Site)		6
		3 2 1 Planning Documents and Work Plan Submittals		6
		3 2 2 Remedial Investigation Field Activities		. 7
		3 2 3 Monthly Progress Reports		7
	3 3	Division Street Station OU (North Branch Site)		8
		3 3 1 Planning Documents and Work Plan Submittals		8
		3.3 2 Remedial Investigation Field Activities		8
		3 3 3 Monthly Progress Reports .		9
	3 4	Willow Street - Hawthorne Avenue Station OU (North Branch Site)		10
		3.4 1 Planning Documents and Work Plan Submittals		10
		3 4 2 Remedial Investigation Field Activities		10
		3 4 3 Monthly Progress Reports		11
	3 5	North Station OU (North Branch Site)		11
		3 5 1 Planning Documents and Work Plan Submittals		12
		3 5 2 Remedial Investigation Field Activities		12
		3 5 3 Monthly Progress Reports		12
	36	Crawford Station	•• •	13
	37	Remaining PGL Sites		13
4	PROF	OSED MASTER SCHEDULE		14
	41	Overview Progress Meetings	• •	14
	42	Adulti City Di De composite	• ••••	14
	43	Schedule for PGL Sites		14
		4 3.1 South Station Upland OU (South Branch Site)	•••	15
		4.3 2 Division Street OU (North Branch Site)		16
		4 3 3 Willow Street – Hawthorne Avenue Station OU (North Bra		17
		4 3.4 North Station OU (North Branch Site)	•	18
		4 3 5 Crawford Station		19
		4 3 6 Throop Station OU (South Branch Site)		20
		4.3.7 Hough Place Station OU (South Branch Site)		20



	4 4	Remaining PGL Sites	21
5	REFE	RENCES	.22

FIGURES

Figure 1 Master Schedule



 	ACRON
AC	NYMS
ARAF	Applicable or Relevant and Appropriate Requirements
ВМс	Burns and McDonnell
CSM	Generalized Conceptual Site Model
FS	Feasibility Study
FSP	Field Sampling Plan
HASF	Health and Safety Plan
IEPA	Illinois Environmental Protection Agency
IBS	Integrys Business Support, LLC
MGP	Manufactured Gas Plant
NRT	Natural Resource Technology, Inc
OU	Operable Unit
PGL	Peoples Gas Light and Coke Company
QAPF	Quality Assurance Project Plan
RAF	Risk Assessment Framework
ROD	Record of Decision
RI	Remedial Investigation
RPM	Remedial Project Manager
sow	Statement of Work
SSWF	Site-Specific Work Plan
USEP	U S. Environmental Protection Agency



	PGL Former MGP Site 2011 Annual Progress Report and Master Schedule Updat Revision 10/28/201 1-Introductio Page 1 of 2
1 IN	FRODUCTION
1.1 Sc	оре
Statement (Settlement Light and concluded in Investigate Update ad sites include (OU), North and South South State	al Progress Report has been prepared in accordance with Task 8, Subtask 8 2 of the of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent at Agreement) between the U.S. Environmental Protection Agency (USEPA) and Peoples Gas Coke Company (PGL), a subsidiary of Integrys Energy Group, effective October 31, 2008. Also this report is a Master Schedule Update that includes the general schedule for Remedial on/Feasibility Study activities at each Site. The Annual Progress Report and Master Schedule dresses PGL's former manufactured gas plant (MGP) Sites located in Chicago, Illinois. The de. Crawford Station, North Branch Site (consisting of Division Street Station Operable Unit th Station OU, and Willow Street-Hawthorne Avenue Station OU), North Shore Avenue Station, Branch Site (consisting of 22 nd Street Station Upland OU, Hough Place Station Upland OU, ion Upland OU, Throop Street Station OU and South Branch River OU). Integrys Business LC (IBS) manages the former MGP sites for PGL
1.2 Ov	erview
This report	t addresses the following
Se	ection 2: Multi-Site Document Progress
Se	ection 3: Site Progress
Se	ection 4: Proposed Master Schedule
Se	ection 5: References
1982 PGL 201	1 ANNUAL PROGRESS RPT AND MASTER SCHEDULE UPDATE 111028



Under the Settlement Agreement and SOW, Multi-Site documents are used to set forth general approaches and concepts to streamline subsequent site-specific work plans and minimize review to The Multi-Site Remedial Investigation (RI) documents are used to maintain a consistent approach investigate and assess potential risk at each site. The Multi-Site Feasibility Study (FS) Support Documents are used to develop general response actions and technologies appropriate for MGP so This section summarizes the status of the Multi-Site Documents. 2.1 Multi-Site RI Documents USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illiand Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2007 (and Multi-Site Risk Assessment Framework – Revision 0, August 5, 2007 (CSM, 2007(b)), Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(and and multi-Site Risk Assessment Framework – Revision 1, September 5, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendus submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the approassessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addedual a conference call was held on September 28, 2011 to discuss the RSLs. This is further discuss Section 2.4.
approaches and concepts to streamline subsequent site-specific work plans and minimize review to The Multi-Site Remedial Investigation (RI) documents are used to maintain a consistent approach investigate and assess potential risk at each site. The Multi-Site Feasibility Study (FS) Support Documents are used to develop general response actions and technologies appropriate for MGP's. This section summarizes the status of the Multi-Site Documents. 2.1 Multi-Site RI Documents 2.2 Multi-Site RI Documents USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illiand Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include. Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2000).
The Multi-Site Remedial Investigation (RI) documents are used to maintain a consistent approach investigate and assess potential risk at each site. The Multi-Site Feasibility Study (FS) Support Documents are used to develop general response actions and technologies appropriate for MGP so This section summarizes the status of the Multi-Site Documents. 2.1 Multi-Site RI Documents USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illia and Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include. Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 20); Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a)). Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)), Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(and)). Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendus submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the approassessing potential vapor intrusion issues. USEPA comments were not received on the RAF Adde out a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the conference call was held on September 28, 2011 to discuss the RSLs.
Investigate and assess potential risk at each site. The Multi-Site Feasibility Study (FS) Support Documents are used to develop general response actions and technologies appropriate for MGP status. This section summarizes the status of the Multi-Site Documents. 2.1 Multi-Site RI Documents USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illiand Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include. In Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2019). In Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a)). In Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)). In Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(a)). In Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendu submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the approassessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addendus and a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the conference call was held on September 28, 2011 to discuss the RSLs.
Documents are used to develop general response actions and technologies appropriate for MGP s This section summarizes the status of the Multi-Site Documents 2.1 Multi-Site RI Documents USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 2008 The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illiand Wisconsin-based subsidiary companies under the USEPA's lead Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2000), Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a)), Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)), Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(a)), Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendu submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the approassessing potential vapor intrusion issues USEPA comments were not received on the RAF Adde out a conference call was held on September 28, 2011 to discuss the RSLs. This is further discusses out a conference call was held on September 28, 2011 to discuss the RSLs. This is further discusses to the conference call was held on September 28, 2011 to discuss the RSLs. This is further discusses to the conference call was held on September 28, 2011 to discuss the RSLs. This is further discusses to the conference call was held on September 28, 2011 to discuss the RSLs. This is further discusses to the conference call was held on September 28, 2011 to discuss the RSLs.
2.1 Multi-Site RI Documents USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 2008 The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illiand Wisconsin-based subsidiary companies under the USEPA's lead Section 1 2 1 of the SOW discusses the Multi-Site RI Documents which include Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 20)
2.1 Multi-Site RI Documents USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illiand Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include. Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2019).
USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illiand Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include. Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 200), Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a)), Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)), Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(a)) Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendu submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen evels (RSL) into the hierarchy for human health screening levels and to further develop the approassessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addendural conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the conference call was held on September 28, 2011 to discuss the RSLs.
The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illiand Wisconsin-based subsidiary companies under the USEPA's lead Section 1 2 1 of the SOW discusses the Multi-Site RI Documents which include Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 20) Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a)), Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)), Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(and)) Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendu submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen evels (RSL) into the hierarchy for human health screening levels and to further develop the approxassessing potential vapor intrusion issues USEPA comments were not received on the RAF Addedut a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the conference call was held on September 28, 2011 to discuss the RSLs.
multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(and multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendu submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen essessing potential vapor intrusion issues USEPA comments were not received on the RAF Adde put a conference call was held on September 28, 2011 to discuss the RSLs. This is further discusses and to discussed in the RAF Adde put a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the RAF Adde put a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the RAF Adde put a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the RAF Adde put a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the RAF Adde put a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the RAF Adde put a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the RAF Adde put a conference call was held on September 28, 2011 to discuss the RSLs.
Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2000). Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a)). Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)). Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(a)). Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendu submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the approxassessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addedut a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussions.
 Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2007). Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a)). Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)). Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(and)). Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendusubmitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the approxassessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addendustral conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed.
 Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a)), Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)), Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(a)) Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendusubmitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the approximates assessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addendustral conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed.
Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)), Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(c) and Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendu submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the approxassessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addendural conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in the RAF Addendural conference call was held on September 28, 2011 to discuss the RSLs.
Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007) and Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendu submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the appropriate sessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addendurate a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed to the RSLs.
and Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)). As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendu submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the appropassessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addendu aconference call was held on September 28, 2011 to discuss the RSLs. This is further discuss
As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendusubmitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the appropriate sessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addendate accordance call was held on September 28, 2011 to discuss the RSLs. This is further discuss
submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screen Levels (RSL) into the hierarchy for human health screening levels and to further develop the approximates assessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addeduct a conference call was held on September 28, 2011 to discuss the RSLs. This is further discuss
Levels (RSL) into the hierarchy for human health screening levels and to further develop the approximates assessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addeduct a conference call was held on September 28, 2011 to discuss the RSLs. This is further discuss
assessing potential vapor intrusion issues USEPA comments were not received on the RAF Adde out a conference call was held on September 28, 2011 to discuss the RSLs. This is further discuss
assessing potential vapor intrusion issues USEPA comments were not received on the RAF Adde out a conference call was held on September 28, 2011 to discuss the RSLs. This is further discuss

Ö



Site-Specific Work Plans (SSWP) are based on the Multi-Site documents and include modifications, as necessary, to reflect site-specific conditions. For instance, a site-specific CSM is included in each SSWP, and it presents pathways documented in the Generalized CSM as well as the rational regarding why or why not a specific pathway is carried through into the baseline risk assessment for that site

2.2 Multi-Site FS Support Document

USEPA approved (USEPA, 2010(d)) the March 26, 2010 Multi-Site FS Support Document dated April 20, 2010 (FS Support Document, 2010(c)) The Multi-Site FS Support Document includes general response actions and preliminary remedial technologies for Integrys Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead

SOW Section 1 2 2 discusses the Multi-Site FS Support Document which includes

- Preliminary Remedial Technology Screening,
- Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (ARAR);
 and
- Preliminary Permitting/Equivalency Requirements

Site-Specific FS evaluations and the Detailed Analysis of Alternatives (FS Report) for each site are based on the Multi-Site FS Support Document

2.3 Multi-Site Document Status

The following table summarizes the status of the Multi-Site Documents.

Document	Submittal Date:	Written USEPA Comments Received
2010 Annual Progress Report and Master Schedule Update (NRT,2010(n))	October 28, 2010	
Risk Assessment Framework Addendum (Exponent, 2011(b))	April 20, 2011	 -

2.4 Multi-Site Meetings

During this reporting period, one multi-site technical meeting and one conference call was conducted to discuss specific technical issues. These meetings/conference calls provide the basis for technical evaluations at each site in the program



2011 Annual	PGL Former MGP Sites Progress Report and Master Schedule Update Revision 0 10/28/2011 2-Multi-Site Documents Page 4 of 24
The technical meeting was held December 17, 2010 with US Exponent (IBS's risk assessors) and NRT to discuss the appathway	•
The conference call was held September 28, 2011 with USE and NRT following the USEPA issuing comments on the RS ethylbenzene. These comments were focused on Wisconsi Stevens Point, Marinette, and Manitowoc sites, but have promanaged under the Multi-site approach by IBS	SLs to be used for naphthalene and n Public Service Corporation's (WPSC)
1982 PGL 2011 ANNUAL PROGRESS RPT AND MASTER SCHEDULE UPDATE 11102	28



	PGL Former MGP Site 2011 Annual Progress Report and Master Schedule Update Revision 10/28/201 3-Site Progres Page 5 of 2
3 SITE PROGRESS	
the Settlement Agreement Project start da Street Station OU, South Branch Site – Sou	RI/FS activities were established in Exhibit A, Section A, of ites were established for the North Branch Site – Division ith Station Upland OU, North Shore Avenue Station Site, and emaining OUs were to be initiated every six months
Station Upland OU (South Branch Site), Div Hawthorne Avenue Station OU (in lieu of No	from the sites identified in the SOW. At this time, the South vision Street Station OU (North Branch Site), Willow Street-orth Shore Avenue Site), and North Station (North Branch les have not been initiated, however, a Time-Critical Removal station site
North Station OU were initiated on Novemb	ation OU, Willow Street-Hawthorne Avenue Station OU, and er 25, 2008, April 28, 2009, and June 15, 2011, respectively, The South Branch Site – South Station Upland OU was the Completion Report
An AOC for a Time-Critical Removal Action	for Crawford Station was signed on October 13, 2011
North Station OU, the Division Street Station period. RI field activities have been perform Station OU during this reporting period. Pre	for the Willow Street/Hawthorne Avenue Station OU, the n OU, and the South Station Upland OU during the reporting ned at the South Station Upland OU and Division Street e-design investigation sampling was also performed at d. Remedial actions have not been performed at any of the mod
completed at each of the MGP sites. As par	provide a concise summary of the progress of the work rt of the progress report, the anticipated progress (as dule Update dated October 28, 2010 (NRT, 2010(n)) is
	EDULE UPDATE 111028



3.1 Overview Progress Meetings

A program overview meeting was not held during this time period

3.2 South Station Upland OU (South Branch Site)

The Project Start Date for the South Station Upland OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (October 31, 2008). However, Completion Report – Revision 0 was submitted on May 13, 2008, prior to finalizing the Settlement Agreement. Per the SOW, scoping meetings and conference calls may be used to discuss the content of South Station Upland OU site-specific documents. No scoping meetings or conference calls were conducted for the South Station Upland OU during the reporting period.

On September 13, 2011, USEPA modified the Settlement Agreement to modify the site boundaries of the South Station Upland OU. The modification excluded Parcels C and D from the Settlement Agreement because review of existing data indicates the source removal has been complete and no further remedial action is planned or anticipated on these parcels.

3.2.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Receive Additional USEPA Comments on Supplemental RI Activities – Vapor Intrusion Technical Memorandum (2010o)			November 9, 2010
Respond to Additional USEPA's Comments (received November 9, 2010) on Supplemental RI Activities – Vapor Intrusion Technical Memorandum (2010p and 2010q)		December 23, 2010	January 21, 2011
Respond to Additional USEPA's Comments (received January 21, 2011) on Supplemental RI Activities – Vapor Intrusion Technical Memorandum (2010r)		February 21, 2011	USEPA Approval March 17, 2011
Submit RI Report – Revision 0 to USEPA ¹	April 21, 2011		
Submit Alternatives Array Tech Memo to USEPA	June 20, 2011	-	
Submit FS Report – Revision 0 to USEPA	October 3, 2011		



1 The submittal date was established in the 2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n)) and assumed the Supplemental RI Field Activities Technical Memorandum was approved by mid-November 2010 These activities were approved in March 2011, as summarized above Supplemental RI activities have been initiated, as discussed in Section 3 2 2. The RI Report submittal date is to be re-established Future activities and submittals are discussed in Section 4

3.2.2 Remedial Investigation Field Activities

RI field activities as described in the SSWP (2009a), were initiated in May 2009 as summarized in the 2009 to 2010 Annual Progress Report (2009e) and the monthly progress reports. Continued RI activities performed at the South Station Upland OU during this progress report period, are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Sixth Groundwater Monitoring Event	January 2011	January 25-27, 2011
Data Validation (fifth through sixth quarter groundwater)		May 2011
Install Supplemental Groundwater Monitoring Wells	December 2010	September 7-9, 2011
Seventh Groundwater Monitoring Event	September 2011	September 12-14, 2011
Hydraulic Conductivity Testing	October 2011	October 3-5, 2011

3.2.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following1 business day) in accordance with Section 8.1 of the SOW

Monthly Progress Report	Submittal Date
October 2010	November 11, 2010
November 2010	December 10, 2010
December 2010	January 12, 2011
January 2011	February 14, 2011
February 2011	March 11, 2011
March 2011	April 18, 2011
April 2011	May 16, 2011
May 2011	June 14, 2011



Monthly Progress Report	Submittal Date
June 2011	July 13, 2011
July 2011	August 15, 2011
August 2011	September 15, 2011
September 2011	October 13, 2011

3.3 Division Street Station OU (North Branch Site)

The Project Start Date for the Division Street Station OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (October 31, 2008) but was re-established to November 25, 2008. Per the SOW, scoping meetings and conference calls may be used to discuss the content of Division Street Station OU site-specific documents. One scoping meeting was held as summarized in the following table.

Ťopic .	Date
Review RI Data, Pre- RI Report Scoping Meeting	October 20, 2011

3.3.1 Planning Documents and Work Plan Submittals

Planning documents and work plans were not anticipated to be submitted during this time period.

3.3.2 Remedial Investigation Field Activities

RI field activities related to characterizing the ambient conditions in the Chicago River, as described in the Appendix F of the USEPA-approved SSWP (2008b), were initiated in July 2010 as summarized in the following table

Task	Targeted Completion Date	Actual Completion Date
Chicago River Upstream of the North Branch MGP Sites Sediment Sampling	December 2010	February 28, 2011
Validation of Ambient Sediment Sampling Results		June 10, 2011
Soil Boring/Groundwater Monitoring Well Installation	November-December 2010	March 21 through April 11, 2011

Task	Targeted Completion Date	Actual Completion Date
Soil Gas Probe Installation/Sampling	November 2010	April 12 through 14, 2011
Groundwater Monitoring Well Development	December 2010	April 11 through 18, 2011
Hydraulic Conductivity Testing		May 16 through 27, 2011
First Quarterly Groundwater Sampling Event	January 2011	May 3 through 4, 2011
Second Quarterly Groundwater Sampling Event	April 2011	August 22 through 24, 2011

3.3.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8 1 of the SOW

Monthly Progress Report	Submittal Date
October 2010	November 11, 2010
November 2010	December 10, 2010
December 2010	January 12, 2011
January 2011	February 14, 2011
February 2011	March 11, 2011
March 2011	April 18, 2011
April 2011	May 16, 2011
May 2011	June 14, 2011
June 2011	July 13, 2011
July 2011	August 15, 2011
August 2011	September 15, 2011
September 2011	October 13, 2011



3.4 Willow Street - Hawthorne Avenue Station OU (North Branch Site)

The Project Start Date for the Willow Street – Hawthorne Avenue Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (October 31, 2008) The start date was established as April 30, 2009 as summarized in the 2008 to 2009 Annual Progress Report (2009e) Per the SOW, scoping meetings and conference calls may be used to discuss the content of Willow Street – Hawthorne Avenue Station OU site-specific documents. No scoping meetings or conference calls were conducted for this site during the reporting period

3.4.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit SSWP – Revision 1 (2011a)	January 26, 2011 ¹	April 18, 2011	April 28, 2011 and June 1, 2011
Submit SSWP – Revision 2 (2011c)		July 15, 2011	Conditional Approval August 30, 2011

^{1.} The submittal date was established in the 2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n)) and assumed the USEPA concurrence with responses to comments on SSWP Revision 0 were received by December 13, 2010, the concurrence was received in email the week of November 1, 2010 However, submittal of SSWP – Revision 1 was postponed to incorporate the discussions of the VI Technical Meeting (December 17, 2011)

3.4.2 Remedial Investigation Field Activities

RI field investigation activities were not completed at the Willow-Hawthorne Station OU during this reporting period



3.4.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8 1 of the SOW

Monthly Progress Report	Submittal Date
October 2010	November 11, 2010
November 2010	December 10, 2010
December 2010	January 12, 2011
January 2011	February 14, 2011
February 2011	March 11, 2011
March 2011	Aprıl 18, 2011
April 2011	May 16, 2011
May 2011	June 14, 2011
June 2011	July 13, 2011
July 2011	August 15, 2011
August 2011	September 15, 2011
September 2011	October 13, 2011

3.5 North Station OU (North Branch Site)

The Project Start Date for the North Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (October 31, 2008) The start date was established as June 15, 2011 as summarized in the 2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n)) Per the SOW, scoping meetings and conference calls may be used to discuss the content of North Station OU site-specific documents. One scoping meeting and one conference call were held as summarized in the following table.

Topic	Date
Post Completion Report and Pre- SSWP Revision 0 Scoping Meeting	July 20, 2011
Pre-SSWP, Revision 1 Scoping Conference Call	October 26, 2011



3.5.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Completion Report – Revision 0 (2011d)	June 15, 2011	June 15, 2011	July 21, 2011
Submit SSWP – Revision 0 (2011e)	August 15, 2011	August 31, 2011 ¹	October 13, 2011

¹ The submittal date was modified to August 31, 2011

3.5.2 Remedial Investigation Field Activities

RI field investigation activities were not completed at the North Station OU during this reporting period However, as part of scoping the SSWP, a site reconnaissance/habitat assessment was performed on July 19, 2011

3.5.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8 1 of the SOW

Monthly Progress Report	Submittal Date
June 2011	July 13, 2011
July 2011	August 15, 2011
August 2011	September 15, 2011
September 2011	October 13, 2011



PGL Former MGP Sites 2011 Annual Progress Report and Master Schedule Update Revision 0 10/28/2011 3-Site Progress Page 13 of 24

3.6 Crawford Station

The Project Start Date for the Crawford Station was established in the 2010 Annual Progress Report and Master Schedule Update Report as December 16, 2011 PGL and USEPA entered into a Time-Critical AOC on October 13, 2011 to address a portion of the site that had MGP residuals at the surface and was accessible for removal. The Time Critical Removal is proceeding under a separate AOC and is therefore, not summarized in detail in this report which address the RI/FS activities.

3.7 Remaining PGL Sites

Additional project start dates for the remaining sites were not established in the 2010 Annual Progress Report and Master Schedule Update Report (NRT, 2010(n))

PGL Former MGP Sites
2011 Annual Progress Report and Master Schedule Update
Revision 0
10/28/2011
4-Proposed Master Schedule
Page 14 of 24

4 PROPOSED MASTER SCHEDULE

Exhibit A of the SOW includes a schedule for major deliverables. The South Station Upland OU, Division Street Station OU, Willow Street – Hawthorne Avenue Station OU, and North Station OU have been initiated. RI field work, as described in the approved SSWPs have been performed at the South Station Upland OU, Division Street OU and ambient sediment in the North Branch Chicago River.

Future submittals and/or activities at South Station Upland OU and Division Street Station OU are dependent on USEPA comments and approvals. The site-specific schedules for Willow-Hawthorne and North Station, presented in the SSWPs, are updated herein to provide proposed site-specific schedules for field activities and major deliverables. A proposed schedule for Crawford Station is presented herein for field activities and major deliverables. The SSWP is subject to USEPA's review/approval. As discussed in Section 3.7. Project Start Dates for remaining PGL sites are to be established.

4.1 Overview Progress Meetings

Overview progress meetings are proposed to be conducted on an as-needed basis at the request of either USEPA or IBS Specific progress meeting dates are not proposed at this time

4.2 Multi-Site RI Documents

The Multi-Site Documents, as described in the SOW, have been completed and approved as summarized in Section 2. Additional Multi-Site Documents are not anticipated at this time. Addendums to the multi-site documents may be issued, as appropriate, to update programmatic procedures or approaches

4.3 Schedule for PGL Sites

Figure 1 summarizes the proposed target dates for RI/FS activities at each of the sites. The proposed target dates are generally consistent with the schedules provided in the SSWPs, adjusted to reflect current status, USEPA approvals and reasonably anticipated approvals. All site schedules are dependent on USEPA approval dates, contractor availability, and sampling seasons (particularly with respect to sediment sampling activities).



Figure 1 considers the deliverable timeframes specified in Exhibit A of the SOW (e.g., SSWPs submitted 90 days following the Completion Report submittal, finalize submittals within 45 days from receipt of USEPA comments, etc.) For planning purposes, it is assumed USEPA will provide comments within 60 days of submittals for Revision 0 and provide approvals within 45 days of receiving Revision 1

The proposed schedules are subject to change Modifications to the schedule, if necessary, will be communicated to USEPA through monthly site-specific progress reports, weekly progress conference calls during RI activities, or other communications

4.3.1 South Station Upland OU (South Branch Site)

The tasks provided in the South Station Upland OU SSWP – Revision 1, dated January 26, 2009 (2009a), have been completed up to submittal of the RI Report – Revision 0. As noted in Section 3.2.2, supplemental RI field activities have been initiated in September 2011, primarily to fully delineate the groundwater plume. Results of the September 2011 RI field data will be reviewed to evaluate the need for additional RI field activities.

Supplemental RI field activities are anticipated to address potential vapor intrusion. These tasks and ongoing post RI groundwater monitoring are presented in Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Submit Supplemental RI Technical Memorandum – Vapor Intrusion, Revision 1 (assumes second groundwater event with wells installed in Sept 2011 is performed mid December 2011 and defines groundwater plume)	February 10, 2012
Supplemental RI Field Activities	Install Additional Groundwater Monitoring Wells, if needed – Mid March 2012
(assumes USEPA approval of Supplemental RI Technical Memorandum – Vapor Intrusion,	Install Soil Gas Probes – late March 2012
Revision 1 by mid March 2012)	Soil Gas Sampling Event 1 – Late March 2012
	Soil Gas Sampling Event 2 – Late June 2012
Submit RI Report – Revision 0 to USEPA	November 8, 2012
Alternatives Array Tech Memo to USEPA	January 7, 2013
FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo early March 2013)	April 22, 2013
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data Preliminarily proposed as quarterly



4.3.2 Division Street OU (North Branch Site)

The tasks provided in the Division Street OU SSWP – Revision 1, dated September 21, 2009 (2009f), have been completed in the upland area. The need for supplemental RI field activities in the upland areas is being evaluated and may be necessary to evaluate the extent of MGP residuals. A technical memorandum, summarizing the scope of supplemental RI field activities, will be submitted to USEPA for approval in advance of implementing the field work. A scoping meeting with USEPA to discuss the potential supplemental sampling was conducted on October 20, 2011.

The sediment adjacent to the Division Street OU will be investigated as described in the SSWP — Revision 1, dated September 21, 2009 and approved April 20, 2010 (2010d), as presented in Figure 1 Sampling rationale, locations, parameters, and frequencies are provided in the SSWP Major deliverable target dates are summarized in the following table

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Submit Supplemental RI Technical Memorandum – Soil, Groundwater, and Soil Gas, Revision 0	January 10, 2012
Supplemental RI Field Activities - Upland	Sample additional soil, Install Additional Groundwater Monitoring Wells, and soil gas - Late February 2012
(assumes USEPA approval of Supplemental RI Technical Memorandum – Vapor Intrusion,	Supplemental GW and Soil Gas Sampling Event 1 – February 2012
Revision 0 by early February 2012)	Supplemental GW and Soil Gas Sampling Event 2 – May 2012
RI Field Activities - Upland	Quarterly RI groundwater monitoring – November 2011 thru February 2012
	Bathymetric Survey
	December 2011 Surface Water Sampling
RI Field Activities - Sediment adjacent to Division Street OU	December 2011 Step I Sediment Sampling (as discussed in the RAF)
(assumed concurrent with Willow Street – Hawthorne Avenue Station OU)	– January 2012 Step II Sediment Sampling (as discussed in the RAF)
	- If necessary, August 2012 (assumes scope is defined by June 2012 and Step II is concurrent with Step I of North Station)



Task/Deliverable	Target Date for Completion
Submit RI Report – Revision 0 to USEPA	February 17, 2013
Alternatives Array Tech Memo to USEPA	March 18, 2013
Submit FS Report – Revision 0 to USEPA	July 1, 2013
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data Preliminarily proposed quarterly

4.3.3 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 was submitted to USEPA on July 15, 2011 (2011c) and conditionally approved on August 30, 2011. The following schedule has been updated since submittal of the revised schedule with the September progress report, dated October 13, 2011. The schedule for implementing upland remedial investigations and report submittals (RI and FS) will be established when site access has been secured.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
	Soil Boring Installation/Soil Vapor Sampling – TBD
RI Field Activities - Upland	Groundwater Monitoring Well Installation/Development – TBD
	Quarterly RI groundwater monitoring – TBD
	Bathymetric Survey – December 2011
RI Field Activities - Sediment adjacent to Willow Street-Hawthorne Avenue Station OU	Surface Water Sampling – December 2011
(assumed concurrent with Division Street	Step I Sediment Sampling (as discussed in the RAF) – January 2012
Station OU)	Step II Sediment Sampling (as discussed in the RAF) – if necessary, August 2012 (assumes scope is defined by June 2012 and Step II is concurrent with Step I of North Station)
Submit RI Report – Revision 0 to USEPA	TBD
Alternatives Array Tech Memo to USEPA	TBD



Task/Deliverable	Target Date for Completion
Submit FS Report – Revision 0 to USEPA	TBD
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data

4.3.4 North Station OU (North Branch Site)

The North Station OU SSWP – Revision 0 was submitted to USEPA on August 31, 2011 (2011e) USEPA comments were received October 13, 2011 and a SSWP Revision 1 will be submitted on November 28, 2011 The following schedule assumes USEPA will approve SSWP Revision 1 within 45 days of receiving the document.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in July 2011
Submit SSWP – Revision 1 to USEPA	November 28, 2011
RI Field Activities – Upland	Soil Boring Installation/Sampling – March 2012
(assumes USEPA approval of SSWP by mid January 2012)	Groundwater Monitoring Well Installation – March 2012
	Soil Gas Probe Installation – March 2012
	Quarterly RI Groundwater Monitoring – April 2012 through January 2013)
	Bathymetric Survey - August 2012
RI Field Activities - Sediment adjacent to North Station OU	Surface Water Sampling - August 2012
(assumed Step I Sampling is concurrent with Division Street Station and Willow Street – Hawthorne Avenue Station OU Step II	Step I Sediment Sampling (as discussed in the RAF) – August 2012
Sampling)	Step II Sediment Sampling (as discussed in the RAF) – if necessary, March 2013
	(assumes scope is defined by early March 2013)
Submit RI Report - Revision 0 to USEPA	July 22, 2013
Alternatives Array Tech Memo to USEPA	September 20, 2013
Submit FS Report – Revision 0 to USEPA	January 3, 2014



4.3.5 Crawford Station

The project start date for the Crawford Station is proposed as December 16, 2011. A detailed proposed schedule will be developed as part of the SSWP. Due to the size and multiple property owners at Crawford Station, it is proposed the site will be subdivided into more manageable Parcel Groups in the SSWP. Parcel Groups will be mutually identified with USEPA and IBS and may be selected based on access, adjacent parcels, or other criterion. Parcel Groups will range in area. For purposes of planning, target completion dates for RI activities at the first Parcel Group are included herein. The number of Parcel Groups to be established and the start dates are to be determined. Proposed target dates for Parcel Group 1, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in January 2012
Submit Completion Report – Revision 0 to USEPA (Project Start Date)	December 16, 2011
Submit Parcel Group 1 SSWP – Revision 0 to USEPA	March 15, 2012
Initiate Parcel Group 1 RI Field Work (USEPA approval of SSWP assumed in July 2012)	October 2012 – Upland
Submit RI Report – Revision 0 to USEPA	November 14, 2013
Alternatives Array Tech Memo to USEPA	January 13, 2014
Submit FS Report - Revision 0 to USEPA	April 28, 2014

4.3.6 Throop Station OU (South Branch Site)

The project start date for the Throop Station OU (South Branch Site) is proposed as June 20, 2012 A detailed proposed schedule will be developed as part of the SSWP Proposed target dates, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in July 2012
Submit Completion Report – Revision 0 to USEPA (Project Start Date)	June 20, 2012
Submit SSWP - Revision 0 to USEPA	September 17, 2012
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in January 2013)	February 2013 – Upland May 2013 – Sediment
Submit RI Report - Revision 0 to USEPA	2014

4.3.7 Hough Place Station OU (South Branch Site)

The project start date for the Hough Place Station OU (South Branch Site) is proposed as December 17, 2012. A detailed proposed schedule will be developed as part of the SSWP. Proposed target dates, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals.

Task/Deliverable	Target Date for Completion						
Monthly Progress Reports	15 th of every month starting in January 2013						
Submit Completion Report – Revision 0 to USEPA (Project Start Date)	December 17, 2012						
Submit SSWP - Revision 0 to USEPA	March 18, 2013						
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in July 2013)	August 2013 – Upland October 2013 – Sediment						
Submit RI Report - Revision 0 to USEPA	2014						



	PGL Former MGP 2011 Annual Progress Report and Master Schedule Up Revis 10/28/
	4-Proposed Master Sche Page 21
4.4 Remaining PGL Sites	
Proposed Project Start Dates and targe	et dates for the remaining sites have not been established pend
	d in Section 4.3 It is anticipated Project Start Dates may be
	Meetings (Section 4 1) or in the 2012 Master Schedule Update
Detailed proposed schedules will be de-	veloped as part of the SSWPs
1982 PGL 2011 ANNUAL PROGRESS RPT AND MASTER	OCCUPANT SUPPLATE 444029

Ö



Plant Sites, prepared for Integrys 2007(b) August 5, 2007 Revision 0, Generalized Conceptual Site Model, for Former Manufactured Plant Sites, prepared for Integrys 2007(c) September 4, 2007 Revision 2, Multi-Site Quality Assurance Project Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys 2007(d) September 5, 2007 Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Fo Manufactured Gas Plant Sites. 2008(c) October 31, 2008 United States Environmental Protection Agency and Peoples Gas Ligh Coke Company, Settlement Agreement and Administrative Order on Consent for Remedia Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois EPA Region 5, CERCLA Docket No V-W-08-C-917 2008(a) September 8, 2008 Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured (Plant Sites) 2009(a) January 26, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, South States Upland Operable Unit, Chicago, Illinois 2009(b) July 16, 2009 Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys	ormer MGP Site Schedule Updat Revision 10/22/201 5-Reference Page 22 of 2
 2007(b) August 5, 2007 Revision 0, Generalized Conceptual Site Model, for Former Manufactured Plant Sites, prepared for Integrys 2007(c) September 4, 2007 Revision 2, Multi-Site Quality Assurance Project Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys 2007(d) September 5, 2007 Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Fo Manufactured Gas Plant Sites. 2008(c) October 31, 2008 United States Environmental Protection Agency and Peoples Gas Ligh Coke Company, Settlement Agreement and Administrative Order on Consent for Remedia Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois EPA Region 5, CERCLA Docket No V-W-08-C-917 2008(a) September 8, 2008 Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured (Plant Sites) 2009(a) January 26, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Static Upland Operable Unit, Chicago, Illinois 2009(b) July 16, 2009 Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys 2009(c) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow S 	
 2007(c) September 4, 2007 Revision 2, Multi-Site Quality Assurance Project Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys 2007(d) September 5, 2007 Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Fo Manufactured Gas Plant Sites. 2008(c) October 31, 2008 United States Environmental Protection Agency and Peoples Gas Ligh Coke Company, Settlement Agreement and Administrative Order on Consent for Remedia Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois EPA Region 5, CERCLA Docket No V-W-08-C-917 2008(a) September 8, 2008 Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured Plant Sites 2009(a) January 26, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Static Upland Operable Unit, Chicago, Illinois 2009(b) July 16, 2009 Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys 2009(c) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow S 	actured Gas
 Manufactured Gas Plant Sites, prepared for Integrys 2007(d) September 5, 2007 Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Fo Manufactured Gas Plant Sites. 2008(c) October 31, 2008 United States Environmental Protection Agency and Peoples Gas Ligh Coke Company, Settlement Agreement and Administrative Order on Consent for Remedia Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois EPA Region 5, CERCLA Docket No V-W-08-C-917 2008(a) September 8, 2008 Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured Plant Sites 2009(a) January 26, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Static Upland Operable Unit, Chicago, Illinois 2009(b) July 16, 2009 Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys 2009(c) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow S 	ufactured Gas
 Manufactured Gas Plant Sites. 2008(c) October 31, 2008 United States Environmental Protection Agency and Peoples Gas Ligh Coke Company, Settlement Agreement and Administrative Order on Consent for Remedia Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois EPA Region 5, CERCLA Docket No V-W-08-C-917 2008(a) September 8, 2008 Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured Plant Sites 2009(a) January 26, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Static Upland Operable Unit, Chicago, Illinois 2009(b) July 16, 2009 Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys 2009(c) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow S 	rmer
Coke Company, Settlement Agreement and Administrative Order on Consent for Remedia Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois EPA Region 5, CERCLA Docket No V-W-08-C-917 2008(a) September 8, 2008 Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured (Plant Sites) 2009(a) January 26, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Static Upland Operable Unit, Chicago, Illinois 2009(b) July 16, 2009 Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys 2009(c) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow S	rk, for Former
Plant Sites 2009(a) January 26, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Static Upland Operable Unit, Chicago, Illinois 2009(b) July 16, 2009 Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys 2009(c) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow S	Remedial
Upland Operable Unit, Chicago, Illinois 2009(b) July 16, 2009 Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys 2009(c) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow S	factured Gas
Manufactured Gas Plant Sites, prepared for Integrys 2009(c) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow S	uth Station
	rmer
	Willow Street -
2009(d) October 6, 2010 United States Environmental Protection Agency Email Regarding Hold of Scoping Meetings/Delaying Throop Street Station Start Date	ng Hold on
2009(e) November 2, 2009. Burns and McDonnell, 2008 to 2009 Annual Progress Report, South B Site and North Branch Site, Chicago, Illinois, The Peoples Light, Gas and Coke Company	
2009(f) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, Division S Station Operable Unit, Chicago, Illinois	Division Street
2010(a) March 17, 2010 United States Environmental Protection Agency Comments on Revision Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, preparately Integrys	
2010(b) March 24, 2010 United States Environmental Protection Agency Email Regarding Revise Schedule Request – South Station Approval	g Revised



	PGL Former MGP Site 2011 Annual Progress Report and Master Schedule Updat Revision 10/28/201 5-Reference Page 23 of 2
	March 26, 2010 Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys
F	April 20, 2010 United States Environmental Protection Agency Approval of Revision 1 Multi-Site easibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for ntegrys
	iune 3, 2010 United States Environmental Protection Agency Comments on Site-Specific Work Plan, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
2	uly 6, 2010 Natural Resource Technology, Inc. Response to USEPA Comments dated June 3, 010 on Site-Specific Work Plan, Willow Street – Hawthorne Avenue Station Operable Unit, chicago, Illinois
	uly 8, 2010 Natural Resource Technology, Inc. Technical Memorandum for Supplemental RI ield Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
S	August 19, 2010 United States Environmental Protection Agency Additional Comments on Site- specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
M	uly 8, 2010 United States Environmental Protection Agency Comments on Technical lemorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station perable Unit, Chicago, Illinois
C	eptember 20, 2010. Natural Resource Technology, Inc. Response to USEPA Additional comments dated August 19, 2010 on Site-Specific Work Plan, Revision 0, Willow Street – awthorne Avenue Station Operable Unit, Chicago, Illinois
A M	eptember 27, 2010 Natural Resource Technology, Inc. Supplement to Characterization of imbient Conditions in the Chicago River Upstream of the North Branch MGP Sites Technical lemorandum (rev. 9/27/10), Chicago, Illinois, Peoples Gas and Light Company CERCLA Docket to V-W-'08-C-917
C	eptember 30, 2010. United States Environmental Protection Agency. Approval of Supplement to haracterization of Ambient Conditions in the Chicago River Upstream of the North Branch MGP ites Technical Memorandum (rev 9/27/10), Chicago, Illinois, Peoples Gas and Light Company ERCLA Docket No. V-W-'08-C-917
S	October 7, 2010. Natural Resource Technology, Inc. Response to USEPA's Comments (dated eptember 7, 2010) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, evision 0, South Station Operable Unit, Chicago, Illinois
S	October 28, 2010, Natural Resource Technology, Inc. 2010 Annual Progress Report and Master chedule Update, Remedial Investigation/Feasibility Study, Peoples Gas Light and Coke ompany, Former Manufactured Gas Plant Sites, CERCLA V-W-08-C-917, Revision 0.
th	lovember 9, 2010 United States Environmental Protection Agency. Additional Comments on le Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South tation Operable Unit, Chicago, Illinois
1982 PGL 20	11 ANNUAL PROGRESS RPT AND MASTER SCHEDULE UPDATE 111028



- 2010(p) December 23, 2010 Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated November 9, 2010) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(q) January 21, 2011. United States Environmental Protection Agency Additional Comments on the Technical Memorandum for Supplemental RI Field Work Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(r) February 21, 2011 Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated January 21, 2011) Technical Memorandum for Supplemental RI Field Work Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2011(a) April 18, 2011 Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 1, Chicago, Illinois
- 2011(b) April 20, 2011 Exponent, Multi-Site Risk Assessment Framework Addendum, Former Manufactured Gas Plant Sites, North Shore Gas Company CERCLA Docket No V-W-07-C-877, Peoples Gas Light and Coke Co CERCLA Docket No V-W-08-C-917, Wisconsin Public Service Corporation CERCLA Docket No V-W-06-C-847
- 2011(c) July 15, 2011 Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 2, Chicago, Illinois
- 2011(d) June 15, 2011 Natural Resource Technology, Inc. Completion Report, North Station Operable Unit, Revision 0, Chicago, Illinois
- 2011(e) August 31, 2011 Natural Resource Technology, Inc. Site-Specific Work Plan, North Station Operable Unit, Revision 0, Chicago, Illinois





						ا			S i			:			1	· ·		
•																		

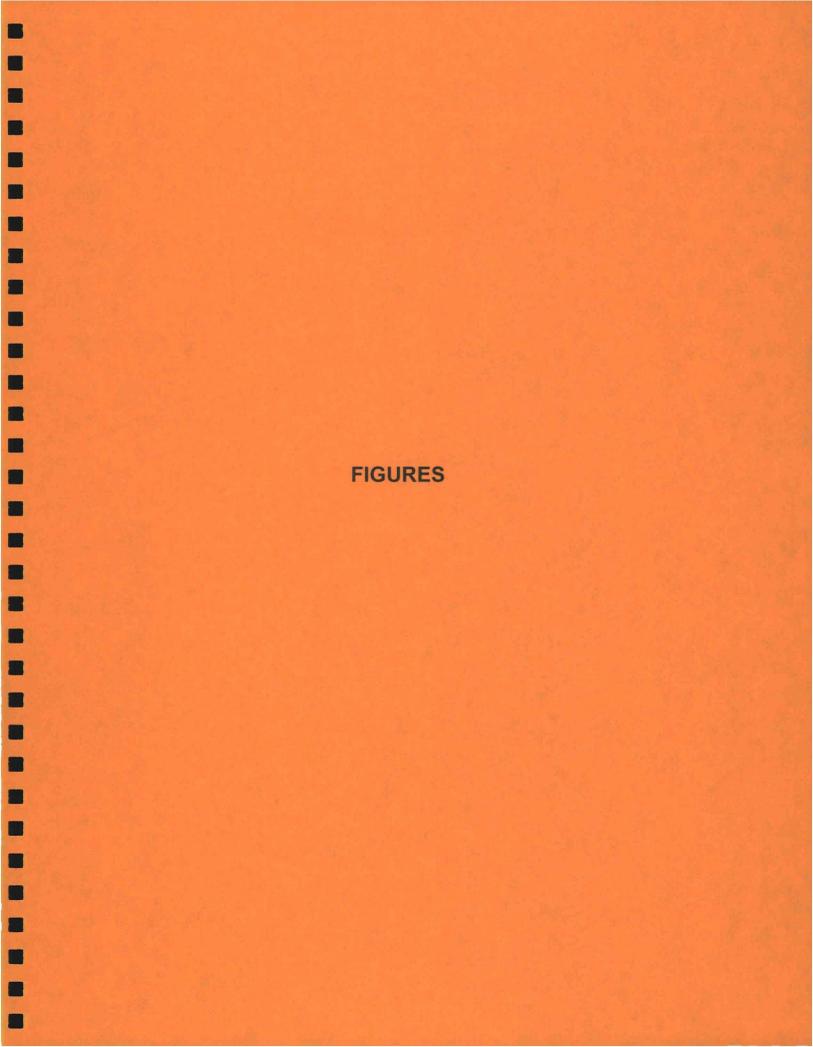


FIGURE 1 2011 Master Schedule Update - Revision 0 Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

CERCLA Docket No. (V-W-08-C-917)

D	0	Task Name	Duration	Start	Finish	2012 2013 2014 2015 2017 Qtr 2 Qtr 3 Qtr 4 Qtr 1 Qtr 2 Qtr 3 Qtr 4 Qtr 3 Qtr 4
1			On the second			Q112 Q113 Q114 Q111 Q112 Q113 Q114 Q111 Q112 Q113 Q114 Q111 Q112 Q113 Q114 Q111 Q112 Q
2		South Station Upland OU Site ID: SSID B5HJ	647 days	Mon 12/12/11	Thu 9/19/13	
3 .	0	On-Going Post RI Groundwater Monitoring Events	287 days	Mon 12/12/11	Tue 9/25/12	12 ♦ ♦ ♦ ♦
_		On-Going Post RI Groundwater Monitoring Events 8, second gw event with supplemental MWs	GW 0 days	Mon 12/12/11		
		On-Going Post RI Groundwater Monitoring Events 9, if needed	0 days			
	***	On-Going Post RI Groundwater Monitoring Events 10, if needed	0 days			
		On-Going Post RI Groundwater Monitoring Events 11, if needed	0 days			
3		Supplemental RI Activities	206 days			
		Update Supplemental RI Tech Memo - Soil Gas	0 days			
0		USEPA Approves Supplemental RI Tech Memo - Soil Gas	0 days			
1		Install Additional Groundwater Monitoring Wells, if needed	2 days			
2		Install Soil Gas Probes	2 days			12
3		Soil Gas Sampling Event 1	0 days			
4		Receive Supplemental Analytical Data	0 days			12
5		Supplemental RI Data Validation	28 days			12
6		Soil Gas Sampling Event 2	0 days			6/28
7		Receive Supplemental Analytical Data	0 days	Mon 7/30/12		7/30
8		Supplemental RI Data Validation	28 days			
9		Prepare RI Report	196 days			13
0		Review Preliminary RI Data with USEPA	0 days			
1		Submit RI Rpt - Rev 0 to USEPA	0 days			12
2		Receive USEPA Comments on RI Rpt - Rev 0	0 days			13
3		Submit RI Rpt - Rev 1 to USEPA	0 days			13 2/2 1
4		USEPA Approves RI Rpt - Rev 1	0 days			
5		Prepare FS Report	255 days	Mon 1/7/13	Thu 9/19/13	13
6		Submit Alternatives Array Tech Memo to USEPA	0 days			
7		Receive USEPA Comments on Alternatives Array Tech Memo	0 days			
8		Submit FS Rpt - Rev 0 to USEPA	0 days			
9		Receive USEPA Comments on FS Rpt - Rev 0	0 days			
0		Submit FS Rpt - Rev 1 to USEPA	0 days			
1		USEPA approves FS Rpt - Rev 1	0 days	Thu 9/19/13	Thu 9/19/13	13
2						
3		Division Street Station OU Site ID SSID B5FZ	860 days	Thu 10/13/11	Tue 2/18/14	14
4		Implement RI Field Activities - Upland OU	171 days	Mon 11/14/11	Wed 5/2/12	12
5		Third Quarter RI GW Sampling	8 days	Mon 11/14/11	Mon 11/21/11	11
6		Soil Gas Sampling Event 2		Wed 11/23/11		
7		Laboratory Analysis (third quarter gw)	30 days	Fri 11/25/11		
8		Data Validation (third quarter gw)	30 days	Fri 12/30/11	Sat 1/28/12	
9		Fourth Quarter RI GW Sampling	8 days			
0		Laboratory Analysis (fourth quarter gw)	30 days	Tue 2/28/12	Wed 3/28/12	
11		Data Validation (fourth quarter gw)	30 days	Tue 4/3/12	Wed 5/2/12	12
12		Supplemental RI Activities	206 days	Tue 1/10/12	Thu 8/2/12	12
13		Supplemental RI Tech Memo - Soil, GW and Soil Gas	0 days	Tue 1/10/12	Tue 1/10/12	
14		USEPA Approves Supplemental RI Tech Memo	0 days			
15		Supplemental Soil Sampling, Addtl GW MW and Soil Gas Probe Installation	5 days	Fri 2/24/12	Tue 2/28/12	
		Task Project Summary		Inactiv	ve Milestone	Manual Summary Rollup Progress
oiect	: 1982	IBS SAS NSG MGP prop Split External Tasks		Inactiv	e Summary	Manual Summary Deadline
	ri 10/28			Manua	al Task	Start-only C

1. This preliminary schedule is dependent on USEPA-approval and weather conditions to complete field investigations. Schedule modifications will be in accordance with the AOC/SOW (CERCLA Docket No. V-W-08-C-917)

Page 1

1982 IBS SAS PGL MGP proposed schedule 111027

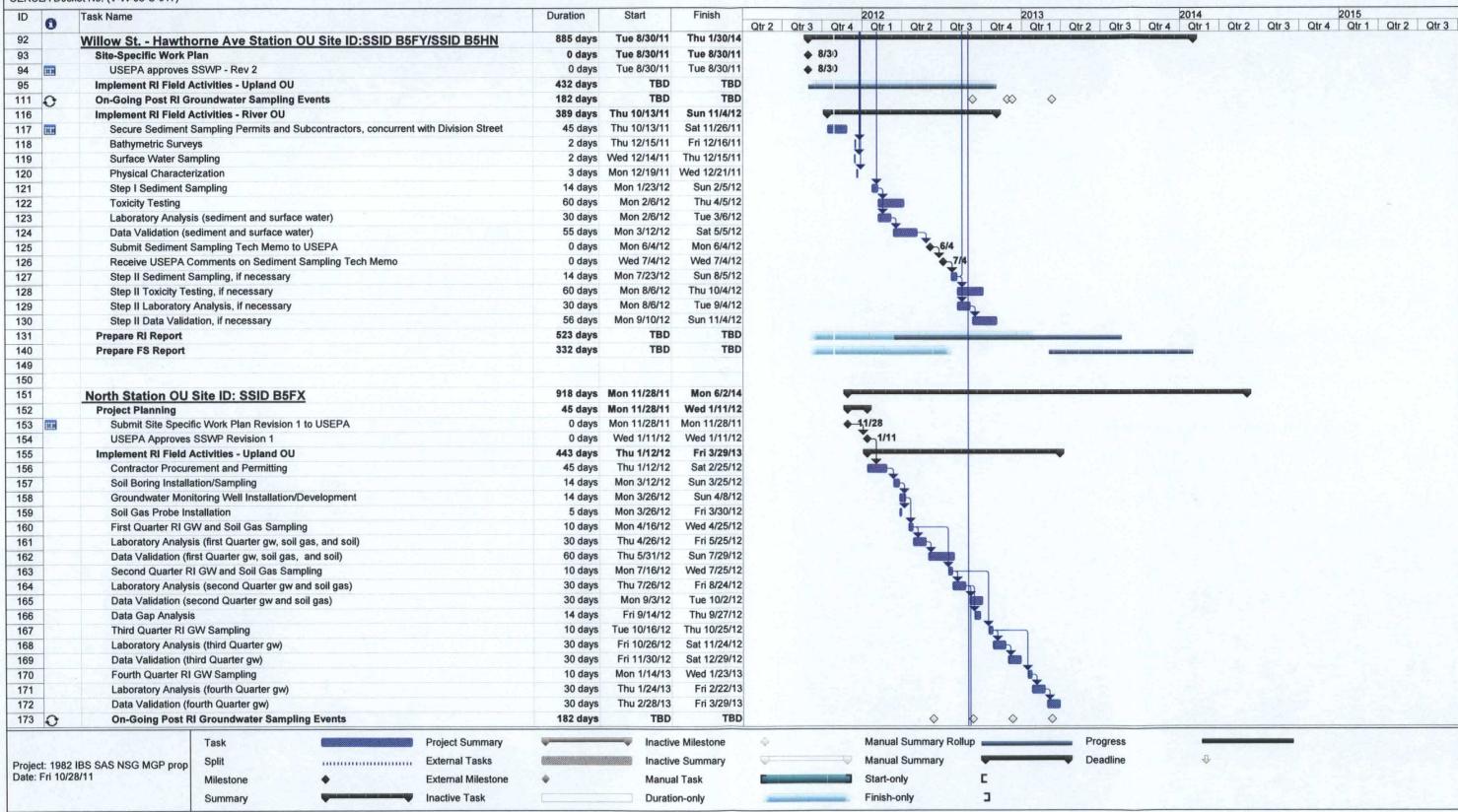
0	Task Name	Duration	Start	Finish	Qtr 2 Qtr 3	Qtr 4	012 Qtr 1	Qtr 2 Q	tr 3 Qtr 4	2013 Qtr 1	Qtr 2 Qtr	3 Otr 4	2014 Otr 1 Otr 2	Qtr 3 Qtr 4	2015 Qtr 1 Qtr 2 Qtr
6	Supplemental GW and Soil Gas Sampling Event 1 (concurrent with Fourth Quarter RI GW Sampling)	2 days	Tue 2/28/12	Wed 2/29/12	QII Z QII S	Qu 4	I I	QIIZ	211 3 Q211 4	Quit	Qu'Z Qu	J Qu +	Gu i Gu z	Qu o qu 4	Gu i Gu E Gu
7	Supplemental GW and Soil Gas Sampling Event 2 (concurrent with On-going Post RI sampling)	2 days	Mon 5/28/12	Tue 5/29/12				4		10					the second
В	Receive Supplemental Analytical Data	0 days	Thu 6/28/12	Thu 6/28/12		. 4		6	6/28	- 2					
9	Supplemental RI Data Validation	28 days	Fri 7/6/12	Thu 8/2/12						-					
0 0	On-Going Post RI Groundwater Sampling Events	196 days	Mon 5/28/12	Tue 12/11/12				∞	♦	>					
1	On-Going Post RI Groundwater Sampling Events 1, if needed	0 days	Mon 5/28/12	Mon 5/28/12				♦ 5/28					D 7-35		10.251177.231
2	On-Going Post RI Groundwater Sampling Events 2, if needed	0 days	Tue 6/12/12	Tue 6/12/12				6/1	2				13 3		1472 - 144 M.
3	On-Going Post RI Groundwater Sampling Events 3, if needed	0 days	Tue 9/11/12	Tue 9/11/12					9/11						1-12g - 17,13g
4	On-Going Post RI Groundwater Sampling Events 4, if needed	0 days	Tue 12/11/12	Tue 12/11/12					4	12/11			100		- 187 La Libert
5	Adjacent to Division Street Station Sediment Investigation	403 days	Thu 10/13/11	Sun 11/18/12		-			-				6 2 2 -		1000
6	Secure Sediment Sampling Permits and Subcontractors	45 days	Thu 10/13/11	Sat 11/26/11									En la		
7	Bathymetric Surveys	3 days	Mon 12/12/11	Wed 12/14/11		1									
8	Surface Water Sampling	2 days	Mon 12/12/11	Tue 12/13/11						1000					
9	Physical Characterization	3 days	Wed 12/14/11	Fri 12/16/11		H				12.5			E		
0	Step I Sediment Sampling	14 days	Mon 1/9/12	Sun 1/22/12			h								- 7
1	Toxicity Testing	60 days	Mon 1/23/12	Thu 3/22/12						1100					
2	Laboratory Analysis (sediment and surface water)	30 days	Mon 1/23/12	Tue 2/21/12											1 1 1
3	Data Validation (sediment and surface water)	56 days	Mon 2/27/12	Sun 4/22/12									"MALT SYLVE		3.97
4	Submit Sediment Sampling Tech Memo to USEPA	0 days	Thu 5/24/12	Thu 5/24/12			100	5/24					0.000		5 J.E. 3
5	Receive USEPA Comments on Sediment Sampling Tech Memo	0 days	Mon 6/25/12	Mon 6/25/12		-		6/	/25						C 47% 3
6	Step II Sediment Sampling, if necessary	14 days	Mon 8/6/12	Sun 8/19/12					a						
7	Step II Toxicity Testing, if necessary	60 days	Mon 8/20/12	Thu 10/18/12									(=)		j.:
8	Step II Laboratory Analysis, if necessary	30 days	Mon 8/20/12	Tue 9/18/12			1								
9	Step II Data Validation, if necessary	56 days	Mon 9/24/12	Sun 11/18/12											
0							8								20.00
1	Prepare RI Report	411 days	Wed 7/18/12	Mon 9/2/13			1	-				-			
2	Review Preliminary Upland RI Data with USEPA	0 days	Wed 7/18/12	Wed 7/18/12				*	7/18						1173.1
3	Review Preliminary Sediment RI Data with USEPA	0 days	Mon 10/8/12	Mon 10/8/12					4 10/8				-		
4	Submit RI Rpt - Rev 0 to USEPA	0 days	Thu 1/17/13	Thu 1/17/13						4 1/17	7				
5	Receive USEPA Comments on RI Rpt - Rev 0	0 days	Mon 3/18/13	Mon 3/18/13					- 17		3/18 5/2 6/3				Mar - mar-
6	Submit Response to USEPA Comments on RI Rpt - Rev 0	0 days	Thu 5/2/13	Thu 5/2/13							5/2				No. 3 (2) 2 (1)
7	Receive USEPA concurrence with Response to Comments on RI Rpt - Rev 0	0 days	Mon 6/3/13	Mon 6/3/13		5					6/3				172 mile 5 mile
8	Submit RI Rpt - Rev 1 to USEPA	0 days	Thu 7/18/13	Thu 7/18/13							4-7	418			Or officers.
9	USEPA Approves RI Rpt - Rev 1	0 days	Mon 9/2/13	Mon 9/2/13								9/2			DE -2 -40
0	Prepare FS Report	337 days	Mon 3/18/13	Tue 2/18/14			100					11 1 1 1			75-30-5
1	Submit Alternatives Array Tech Memo to USEPA	0 days	Mon 3/18/13	Mon 3/18/13							3/18				MAL DE ARROYS
2	Receive USEPA Comments on Alternatives Array Tech Memo	0 days	Fri 5/17/13	Fri 5/17/13		100			7-2-		♦ -5/17				
3	Submit FS Rpt - Rev 0 to USEPA	0 days	Mon 7/1/13	Mon 7/1/13			17.00				7/	1			
4	Receive USEPA Comments on FS Rpt - Rev 0	0 days	Mon 9/2/13	Mon 9/2/13						100		9/2			
5	Submit Response to USEPA Comments on FS Rpt - Rev 0	0 days	Fri 10/18/13	Fri 10/18/13						1 - 1	3/18 5/17 4 7/1	10/	18		
6	Receive USEPA concurrence with Response to Comments on FS Rpt - Rev 0	0 days	Tue 11/19/13	Tue 11/19/13								-	11/19		
7	Submit FS Rpt - Rev 1 to USEPA	0 days	Fri 1/3/14	Fri 1/3/14					100	1			110		
8	USEPA approves FS Rpt - Rev 1	0 days	Tue 2/18/14	Tue 2/18/14			2 11		1	16"			2/18		
9				- // /						1 %					E STATE
0							1		Bar - w				113.00		
1									7.52						
				a Mila-t	^		Maruel	umarrar D	allun	PATH LL	Drooms				A MANAGEMENT
	Task Project Summary		Inactiv	e Milestone	φ.			ummary Ro	oliup		Progress		3 3334		
oject: 1982	2 IBS SAS NSG MGP prop Split External Tasks		Inactiv	e Summary	4		Manual S	ummary			Deadline	е	1		
te: Fri 10/2		•	Manua	al Task			Start-only		С						
						1117 = 1									

^{1.} This preliminary schedule is dependent on USEPA-approval and weather conditions to complete field investigations. Schedule modifications will be in accordance with the AOC/SOW (CERCLA Docket No. V-W-08-C-917)

Page 3

CERCLA Docket No. (V-W-08-C-917)

1982 IBS SAS PGL MGP proposed schedule 111027



1. This preliminary schedule is dependent on USEPA-approval and weather conditions to complete field investigations. Schedule modifications will be in accordance with the AOC/SOW (CERCLA Docket No. V-W-08-C-917)

FIGURE 1 2011 Master Schedule Update - Revision 0 Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

D A Ta	ask Name			New York Districts	Duration	Start	Finish				112			2013		2014	-	2015
_	Implement RI Field A	ethrities Birer OII			356 days	Mon 6/11/12	Sat 6/1/13	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2 Qtr 3	Qtr 4	Qtr 1 Qtr 2	Qtr 3 Qtr	4 Qtr 1 Qtr	2 Qtr 3 Qtr	4 Qtr 1 Qtr 2 Qt
78	THE VEHICLE WAS DESCRIBED THE PROPERTY OF THE PROPERTY OF		Subcontractors (concurren	t with	45 days	Mon 6/11/12												
9			Sediment Sampling, if nee		45 days	WIOTI 0/11/12	VVCG 7/25/12											
0	Bathymetric Survey	CHARLES SERVICE SERVICES	,		3 days	Fri 8/10/12	Sun 8/12/12		9 15 3	- 1		7						
1	Surface Water San	npling			2 days	Mon 8/13/12	Tue 8/14/12					H						
2	Physical Character	ization			3 days	Fri 8/17/12	Sun 8/19/12			100				1 1 1 1				
3	Step I Sediment Sa	mpling			14 days	Mon 8/20/12	Sun 9/2/12					T.						
4	Laboratory Analysis	s (sediment and surface	ce water)		60 days	Mon 9/3/12	Thu 11/1/12		- 200									
5	Toxicity Testing				60 days	Mon 9/3/12	Thu 11/1/12							5° -				
6		diment and surface wa	ater)		55 days	Wed 11/7/12	Mon 12/31/12		7/4/3/1					h				
7	Submit Sediment S	ampling Tech Memo t	to USEPA		0 days	Wed 1/30/13	Wed 1/30/13							1/30				
В	Receive USEPA C	omments on Sediment	t Sampling Tech Memo		0 days	Fri 3/1/13	Fri 3/1/13							3/1				
9	Step II Sediment S	ampling, if necessary			14 days	Wed 3/20/13	Tue 4/2/13		-72.70									
0	Step II Toxicity Tes	ting, if necessary			60 days	Wed 4/3/13	Sat 6/1/13											- 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1	Step II Laboratory	Analysis, if necessary			30 days	Wed 4/3/13	Thu 5/2/13		- 10									
2	Prepare RI Report				627 days	Thu 9/13/12	Mon 6/2/14									1 1 1 1 1	•	
3	Review Preliminary	RI Data with USEPA			0 days	Thu 9/13/12	Thu 9/13/12			- 1		*	9/13					
4	Review Preliminary	Sediment RI Data wit	th USEPA		0 days	Mon 4/22/13	Mon 4/22/13		46.6					4/:	22			Carlo Carlo State V
5	Submit RI Rpt - Re	v 0 to USEPA			0 days	Mon 7/22/13	Mon 7/22/13							1000	7/22			W 20 2755
3	Receive USEPA C	omments on RI Rpt - F	Rev 0		0 days	Fri 9/20/13	Fri 9/20/13			200					9/20			
7	Submit Response t	o USEPA Comments	on RI Rpt - Rev 0		0 days	Mon 11/4/13	Mon 11/4/13			-						11/4		
3			onse to Comments on RI R	pt - Rev 0	0 days	Wed 12/4/13	Wed 12/4/13								7/22	12/4		
)	Submit RI Rpt - Re	v 1 to USEPA			0 days	Mon 1/20/14	Mon 1/20/14							I STATE OF		1/20		
	USEPA Approves I	RI Rpt - Rev 1			0 days	Thu 3/6/14	Thu 3/6/14									♦ 3/6		
	Prepare FS Repor	t			255 days	Fri 9/20/13	Mon 6/2/14								-		•	
2	Submit Alternati	ves Array Tech Memo	to USEPA		0 days	Fri 9/20/13	Fri 9/20/13								9/20			13 15 27
3	Receive USEPA	Comments on Altern	atives Array Tech Memo		0 days	Tue 11/19/13	Tue 11/19/13		7-1-1-1							1/19		44 (E.S.)
4	Submit FS Rpt	Rev 0 to USEPA			0 days	Fri 1/3/14	Fri 1/3/14									1/3		
5	Receive USEPA	Comments on FS Rp	ot - Rev 0		0 days	Tue 3/4/14	Tue 3/4/14		341.00							♦ 3/4		SHEWARK TELE
6	Submit FS Rpt -	Rev 1 to USEPA			0 days	Fri 4/18/14	Fri 4/18/14									4-4	/18	10 (XS)(EAZ)(A)
7	USEPA approve	es FS Rpt - Rev 1			0 days	Mon 6/2/14	Mon 6/2/14		- 10000							- La part 23	♦ 6/2	
8										100								
9 C	rawford Station S	ite ID: SSID B5H	K		1233 days	Fri 12/16/11	Fri 5/1/15			-		1 1 1 1 1		1 1 1 1 1 1	1 1 1 1 1	11111		
0	Project Planning				0 days	Fri 12/16/11	Fri 12/16/11			4 12	2/16							
1	Submit Completion	Report - Revision 0 to	USEPA		0 days	Fri 12/16/11	Fri 12/16/11			4 1:	2/16					of the first		
2	Parcel Group 1				983 days	Mon 1/16/12	Thu 9/25/14						the land of the land					
3		Vork Plan Scoping Mee			0 days	Mon 1/16/12	Mon 1/16/12		- 1		1/16					1 200		
4	Submit Site Specifi	c Work Plan - Revision	n 0 to USEPA		0 days	Wed 3/14/12	Wed 3/14/12		5 (1)		3/	14						
5	Receive USEPA C	omments on Draft SSV	WP Revision 0		0 days	Mon 5/14/12	Mon 5/14/12				1111	<u>♦ 5/</u> 14		Li marine				
6 1	Submit Site Specifi	c Work Plan Revision	1 to USEPA		0 days	Thu 6/28/12	Thu 6/28/12			- 02		6/28		5 to 1				The second
7	USEPA Approves	SSWP Revision 1			0 days	Sun 7/29/12	Sun 7/29/12					6/28	29	A PARTY OF THE PAR				2-1
8	Initiate RI Field W	ork			788 days	Mon 7/30/12	Thu 9/25/14						-	100			-	e 1 - 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
9	Contractor Proc	urement and Permittin	ng		45 days	Mon 7/30/12	Wed 9/12/12						4					
0		allation/Sampling			14 days	Fri 9/28/12	Thu 10/11/12		1				1			The Work of		William Co.
1	Groundwater M	onitoring Well Installat	tion/Development		14 days		Thu 10/25/12		9 . 1.3	- 1			1					
22	Soil Gas Probe	Installation			5 days		Tue 10/16/12			45			1	Licery		S. M. L.		
23	First Quarter RI	GW and Soil Gas Sar	mpling		10 days	Fri 11/2/12	Sun 11/11/12						. In	<u> </u>			KWILL	
		Tack		Project Summary		Inactive	e Milestone	A	7	14	anual Suu	nmary Rollup		D	rogress		A EN AL STEEL	
		Task		Estamol Tools	_			7								n	A PARTIE L	
ject: 1982 IBS	SAS NSG MGP prop	Split					e Summary			M	anual Sur	nmary			eadline	4		
te: Fri 10/28/11		Milestone	•	External Milestone	•	Manua	Task	Distance on		St	tart-only		С					
		Summary		Inactive Task		Duratio	n-only	1		Fi	inish-only		3					

^{1.} This preliminary schedule is dependent on USEPA-approval and weather conditions to complete field investigations. Schedule modifications will be in accordance with the AOC/SOW (CERCLA Docket No. V-W-08-C-917)

Page 4

October 28, 2011

CERCLA Docket No. (V-W-08-C-917)

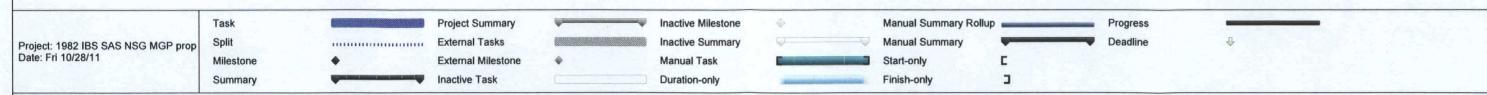
ID O	Task Name				Duration	Start	Finish	Qtr 2 Qtr 3 Qtr 4	012 Otr 1 Otr 2 Ot	2013 tr 3 Qtr 4 Qtr 1	Otr 2 Otr 3	2014 Otr 4 Otr 1 Otr 2 Otr 3	2015 Qtr 4 Qtr 1 Qtr 2 Qtr
224	Laboratory Analy	ysis (first Quarter gw, soil gas	s, and soil)		30 days	Mon 11/12/1	2 Tue 12/11/12	CHE CHO CHY	Still Still G		SKII IS SKII O	San I San I San E San O	The same of the sa
225		first Quarter gw, soil gas, ar			60 days	Mon 12/17/1	2 Thu 2/14/13						
226		RI GW and Soil Gas Samplin			10 days	Fri 2/1/1	3 Sun 2/10/13			1			
227		ysis (second Quarter gw and			30 days	Mon 2/11/1	3 Tue 3/12/13			Year of the second	bn l		
228		second Quarter gw and soil			30 days	Fri 3/22/1	3 Sat 4/20/13						
229	Data Gap Analys				14 days	Tue 4/2/1	3 Mon 4/15/13						
230	Third Quarter RI				10 days	Sat 5/4/1	3 Mon 5/13/13						
231	Laboratory Analy	ysis (third Quarter gw)			30 days	Tue 5/14/1	3 Wed 6/12/13						
232	Data Validation	(third Quarter gw)			30 days	Tue 6/18/1	3 Wed 7/17/13						
233	Fourth Quarter F				10 days	Fri 8/2/1	3 Sun 8/11/13				1		
234	Laboratory Analy	ysis (fourth Quarter gw)			30 days	Mon 8/12/1	3 Tue 9/10/13						
235		(fourth Quarter gw)			30 days	Mon 9/16/1	3 Tue 10/15/13						
236	Prepare RI Rep				455 days	Mon 4/1/1	3 Mon 6/30/14						
237	Review Prelin	minary RI Data with USEPA			0 days	Mon 4/1/1	3 Mon 4/1/13				♦ 4/1		
238	Submit RI Rp	ot - Rev 0 to USEPA			0 days	Thu 11/14/1	3 Thu 11/14/13					<u>→ 11/</u> 14	
239		PA Comments on RI Rpt - R	Rev 0		0 days	Mon 1/13/1	4 Mon 1/13/14					♦ 1/13	
240		onse to USEPA Comments of			0 days	Thu 2/27/1	4 Thu 2/27/14					11/14 1/13 2/27 3/31	
241		PA concurrence with Respon		RI Rpt - Rev 0	0 days	Mon 3/31/1	4 Mon 3/31/14					<u>♦ 3/</u> 31	
242		ot - Rev 1 to USEPA			0 days	Thu 5/15/1	4 Thu 5/15/14					5/15	
243	USEPA Appr	oves RI Rpt - Rev 1			0 days	Mon 6/30/1	4 Mon 6/30/14					6/30	
244	Prepare FS Rep				255 days	Mon 1/13/1	4 Thu 9/25/14					•	-
245		natives Array Tech Memo to I	USEPA		0 days	Mon 1/13/1	4 Mon 1/13/14					4-1/13	
246		PA Comments on Alternative			0 days	Fri 3/14/1	4 Fri 3/14/14					<u>→ 3/</u> 14	
247	Submit FS R	pt - Rev 0 to USEPA			0 days	Mon 4/28/1	4 Mon 4/28/14					4/28	
248	Receive USE	PA Comments on FS Rpt - F	Rev 0		0 days	Fri 6/27/1	4 Fri 6/27/14					6/27	
249	Submit FS R	pt - Rev 1 to USEPA			0 days	Mon 8/11/1	4 Mon 8/11/14						8/11
250		oves FS Rpt - Rev 1			0 days	Thu 9/25/1	4 Thu 9/25/14						♦ 9/25
251	Parcel Group 2				897 days	ТВ	D TBD						
283	Parcel Group 3				900 days	TB	D TBD	100					
315													
316	Throop Station OU	Site ID: SSID B5HM			331 days	Wed 6/20/1	2 Thu 5/16/13		_				
317		port - Revision 0 to USEPA			0 days	Wed 6/20/1	2 Wed 6/20/12		♦_5/2	20			
318	Pre-Site-Specific Work	Plan Scoping Meeting			0 days	Thu 7/19/1	2 Thu 7/19/12						
319	Receive USEPA Com	ments on Completion Report	i		0 days	Sat 8/18/1	2 Sat 8/18/12			♦ 8/18			
320	Submit Site Specific W	ork Plan - Revision 0 to USE	EPA		0 days	Mon 9/17/1	2 Mon 9/17/12			9/17			
321	Receive USEPA Com	ments on Draft SSWP Revision	ion 0		0 days	Thu 11/1/1	2 Thu 11/1/12			41/1			
322	Submit Site Specific V	ork Plan Revision 1 to USEF	PA		0 days	Mon 12/17/1	2 Mon 12/17/12			7/19			
323	USEPA Approves SSV				0 days	Wed 1/16/1	3 Wed 1/16/13			1/1	6—		
324	Initiate RI Field Work				90 days	Fri 2/15/1	3 Thu 5/16/13						
325	Initiate Upland RI F				0 days	Fri 2/15/1				*	2/15		
326	Initiate River RI Fie				0 days	Thu 5/16/1	3 Thu 5/16/13				5/16		
327							11						
328													
329	Hough Place Statio	n OU Site ID: SSID B	5HH		305 days	Mon 12/17/1	2 Thu 10/17/13						
330		port - Revision 0 to USEPA			0 days	Mon 12/17/1	2 Mon 12/17/12			♦ <u>_12/17</u>			
331		Plan Scoping Meeting			0 days	Tue 1/15/1	3 Tue 1/15/13			1/1	5		
332		ments on Completion Report			0 days	Thu 2/14/1	3 Thu 2/14/13				2/14		
				Desired Commerce		la	tive Milestone	_	Manual Summan, Da	dlup	Progress	The Landers	
		Task		Project Summary			tive Milestone		Manual Summary Ro	oliup	Progress	THE PROPERTY OF	
Project: 1982 I	BS SAS NSG MGP prop	Split		External Tasks		Inac	tive Summary		Manual Summary		Deadline	4	
Date: Fri 10/28		Milestone	•	External Milestone	•	Man	ual Task		Start-only	С			
		Summary		Inactive Task		Dur	ation-only		Finish-only	3			
	Service of the service of	Callinary		IIIIIIII I IIII		Duit	orr orny						

^{1.} This preliminary schedule is dependent on USEPA-approval and weather conditions to complete field investigations. Schedule modifications will be in accordance with the AOC/SOW (CERCLA Docket No. V-W-08-C-917)

FIGURE 1 2011 Master Schedule Update - Revision 0 Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

CERCLA Docket No. (V-W-08-C-917)

ID _	Task Name	Duration	Start	Finish			2	2012				2013	STATE OF	2014			2015		
0					Qtr 2	Qtr 3	Qtr 4	4 Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1 Qtr 2 Qtr 3	Qtr 4	Qtr 1	1 Qtr 2	Qtr 3 Qt	4 Qtr 1	Qtr 2	Qtr
33	Submit Site Specific Work Plan - Revision 0 to USEPA	0 days	Mon 3/18/13	Mon 3/18/13								♦ 3/ 18		1 - 4-4					
34	Receive USEPA Comments on Draft SSWP Revision 0	0 days	Thu 5/2/13	Thu 5/2/13			100					5/2					Way c		
35	Submit Site Specific Work Plan Revision 1 to USEPA	0 days	Mon 6/17/13	Mon 6/17/13								6/17							
336	USEPA Approves SSWP Revision 1	0 days	Fri 7/19/13	Fri 7/19/13							6/17	9				100			
337	Initiate RI Field Work	59 days	Mon 8/19/13	Thu 10/17/13			7.70												
338	Initiate Upland RI Field Work	0 days	Mon 8/19/13	Mon 8/19/13							*	8/19							
339	Initiate River RI Field Work	0 days	Thu 10/17/13	Thu 10/17/13			9 4					♠ 10/	17						
340																			
341	22nd Street Station OU Site ID: B5FW	0 days	Mon 10/31/11	Mon 10/31/11			10/3	1											
342	Project Start Date to be Established in October 2012 Master Schedule Update	0 days	Mon 10/31/11	Mon 10/31/11			♦ 10/3	1				10° -25832-554							
343																			
344	North Shore Avenue Station Site ID: SSID B5HL	0 days	Mon 10/31/11	Mon 10/31/11										15000					
345	Project Start Date to be Established in October 2012 Master Schedule Update	0 days	Mon 10/31/11	Mon 10/31/11			10/3	1					100			7 6 7			
346														1 7 7 7 1			1467		
347	Pitney Court Station OU Site ID: SSID B5HP	0 days	Mon 10/31/11	Mon 10/31/11								100 miles - 100 miles							
348	Project Start Date to be Established in October 2012 Master Schedule Update	0 days	Mon 10/31/11	Mon 10/31/11			10/3	1				the second secon		1.25					
349												Problem Strain		10-19					
350	South Branch River OU	0 days	Mon 10/31/11	Mon 10/31/11			10/3	1											
351	Project Start Date to be Established in October 2012 Master Schedule Update	0 days	Mon 10/31/11	Mon 10/31/11			10/3	1				and the second							



^{1.} This preliminary schedule is dependent on USEPA-approval and weather conditions to complete field investigations. Schedule modifications will be in accordance with the AOC/SOW (CERCLA Docket No. V-W-08-C-917)

October 28, 2011



23713 W. PAUL ROAD, SUITE D PEWAUKEE, WI 53072 (P) 262.523.9000 (F) 262.523.9001

Mr. Ross del Rosario Remedial Project Managers USEPA, Region 5 77 W. Jackson Boulevard Chicago, IL 60604-3590 October 28, 2011 (1982/5.0)

RE:

2011 Annual Progress Report and Master Schedule Update – Revision 0
Peoples Gas Light and Coke Company's Former Manufactured Gas Plant Sites

CERCLA Docket No.: V-W-08-C-917

Dear Mr. del Rosario:

On behalf of Integrys Business Support, LLC (IBS), managing Peoples Gas Light and Coke Company's (PGL) former manufactured gas plant (MGP) sites, please find enclosed two hard copies of the 2011 Annual Progress Report and Master Schedule Update for the Chicago sites. This report summarizes activities performed between October 31, 2010 and October 28, 2011 and provides a proposed schedule for future activities.

This 2011 Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and PGL, effective October 31, 2008.

Please do not hesitate to contact Mr. Naren Prasad (IBS) at 312.240.4569 if you have any questions regarding this document.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

Janifer M. Kuhler

Jennifer M. Kahler, PE

Senior Engineer

Laurie L. Parsons, PE

auro X. Garsons

Principal Engineer

Enc.: As noted above (2 hard copies and 2 CD copies)

cc: Ms. Joan Tanaka (hard copy and CD copy)

Mr. Brian Bartoszek, IBS (w/o attachments)

Mr. Naren Prasad, IBS (hard copy and CD copy)

Mr. Doyle Wilson, IEPA (hard copy and CD copy)

Mr. Mark Thimke, Foley & Lardner (w/o attachments)

Mr. Dave Klatt, USEPA Contractor - CH2MHill (hard copy and CD copy)

1982 PGL Annual Progress and Schedule Update R del Rosario trans 111028